

## REMARKS

In the Office Action of June 1, 2007, claims 1-66 in this application were rejected under either 35 U.S.C. §102(e) or 35 U.S.C. §103(a). The dependent claims 6, 16, 35, 44, and 46 have been canceled, and claims 1, 8, 33, 40, and 45 have been amended to include the limitations of those canceled claims. Additionally, claims 47 and 48 are amended. Applicant respectfully submits that claims 1-66 as amended contain patentable subject matter and thus requests a withdrawal of the rejections.

### Claim 1

The examiner has rejected claim 1 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant has amended claim 1 to include the limitations of claim 6, which the examiner rejected under 35 U.S.C. §102(e) as anticipated by Edson.

Applicant respectfully submits that claim 1 as amended is not anticipated by Edson. Claim 1 as amended comprises a consumer electronics device communication and control system, further comprising a gateway device which includes a computer system interface, and a network/computer system interface module connected to the computer system interface and the network input interface. Edson is missing a computer system interface and a network/computer system interface module connected to the computer system interface and the network input interface.

The examiner rejected this element as met by Edson in Col. 4, Lines 36-43, which states that the “associated device specific interfaces enable connection. . . within the premises to the network.” Fig. 1 of Edson illustrates this operability, showing the devices, including the computer 43, connected via the device interface 323 to the network.

The claim language and the supporting specification of the Applicant’s invention, however, describe a different configuration than that disclosed by Edson. The computer system interface described in claim 1 as amended does not describe the configuration of a computer attached to a network data or power backbone as shown in Edson, but rather describes a computer system interface that may communicate directly with a gateway device. *See* Claim 1 as amended; *see also* Application 10/617,136, Fig. 11, Computer Systems 128 which communicate directly to Gateway Device 114; *see also* Application 10/617,136, Paragraph 0399.

Not only does the above configuration described in claim 1 as amended constitute patentable material under 35 U.S.C. §102, it also satisfies the non-obviousness requirement of 35 U.S.C. §103. The configuration of claim 1, in allowing for direct communication between computer system interfaces and the gateway device, allows for the use of computers interfaces within the system without substantially compromising the resources of the network data or power backbone, especially as it relates to computer system interface communication through the gateway to the telephone system or the Internet. Allowing for computer system interface communication to the gateway 114 itself, to the telephone system 124, and to the Internet 122, without sacrificing network data

backbone 104 or power backbone 110 resources, is a significant inventive development within the context of the Applicant's invention of a universal digital communications and control system for consumer electronic devices that fully satisfies the requirements of 35 U.S.C. §103.

*Claim 8*

The examiner has rejected claim 8 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant has amended claim 8 to include the limitations of claim 16, which the examiner rejected under 35 U.S.C. §103(a) over Edson in view of Juskiewicz (Media-Accelerated Global Information Carrier; May 3, 2003, Revision 3.0c). Applicant respectfully submits that claim 8 as amended satisfies the requirements of both 35 U.S.C. §102(e) and 35 U.S.C. §103(a).

Claim 8 as amended comprises a network/electronic device interface module which includes a MaGIC network/electronic device interface module. Edson does not contain this element, and thus claim 8 as amended satisfies the requirements of 35 U.S.C. §102(e).

Claim 8 as amended also satisfies the non-obviousness requirements of 35 U.S.C. §103(a). While the Jusckiewicz specification document may include a MaGIC network/electronic device interface module, the invention of a consumer electronics device communication and control system which includes a MaGIC module as recited in claim 8 is not obvious to one of ordinary skill in the art at the time of the invention.

The MaGIC technology as described in the referenced document discloses its use within the context of music and audio technology. The cited pages of the MaGIC document explain that MaGIC technology was motivated by the drawback that “real-time high-fidelity digital audio has yet to permeate both production and live performance,” that there is “a compelling need in the audio industry for an Open Architecture digital interconnect,” and that “MaGIC provides the ability to create such audio networks appropriate for use in a wide variety of environments ranging from professional audio to home music installations.” While the use of MaGIC is not limited by those suggested applications, the disclosure does not actually describe the type of expansive use embodied in the Applicant’s invention of a universal digital communications and control system for consumer electronic devices.

Accordingly, the Applicant’s use of MaGIC technology as recited in claim 8 is not obvious over Edson in view of the Juskiewicz document. The system conceived in claim 8 comprises a consumer electronics device communication and control system, further comprising a data network and a consumer electronic device. As supported in the specification of this Application, this system may comprise much more than the disclosed configuration of the Juskiewicz document. The system may be part of a “wired home” (Application 10/617,136, Paragraph 0019; see also Paragraph 0050), and may comprise new undisclosed elements such as plasma screens and DVD players (Application 10/617,136, Paragraph 0380), and may comprise operability with telephone systems, the Internet, computer interfaces, and wireless devices (Application 10/617,136, Paragraphs 0399-0400, 0404), or even

with playstation video games (Application 10/617,136, Paragraph 0418). The communication and control system of claim 8 allows for such further creative and new use of the MaGIC technology than as disclosed in the Juskiewicz document, that it constitutes a significant inventive development within the context of the Applicant's invention of a universal digital communications and control system for consumer electronic devices that fully satisfies the requirements of 35 U.S.C. §103.

*Claim 17*

The examiner has rejected claim 17 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant respectfully submits that Edson is missing a network/bridge device interface module connected to the network input interface and the legacy device interface as recited in claim 17.

The examiner rejected this element as met by Edson in the Abstract, Lines 1-7, and in Col. 7, Lines 44-54. The relevant lines of the Abstract are as follows:

The present invention utilizes a gateway providing an open software interface to control in-home communications and to enable in-home devices of various divergent technologies to selectively access external communication features. An in-home communication network utilizes any one or more of several available in-home digital networking media to connect the gateway to device interfaces.

The relevant lines of Col. 7 are as follows:

An appropriate control device 41C controls appliances, such as 41. The control device 41C may send appliance status information or alarms and/or receive control command codes via the network 11. Video devices, such as the TV 42 and/or a VCR (not shown) also send and/or receive digital signals via the network 11. It is also envisioned that the user will have one or more personal computers (PCs) 43 coupled to the network. The PC preferably provides a user interface to allow monitoring and control of other devices on the network 11 and provides a terminal for the user interface to the gateway 13.

Edson does not recite a network/bridge device interface module connected to the network input interface and the legacy device interface, as recited in claim 17. Rather, Edson merely describes a gateway providing an interface with in-home devices over networking media. Applicant's claim 17 describes more than a mere device interface with a network.

Applicant's claim 17 recites a network/bridge device interface module, which, as supported in the Application specifications, "is adapted to receive legacy audio and control data from a legacy device 130 in any one of a variety of legacy digital data communication formats, . . . to convert that data into a format that can be transmitted over the data network 102, e.g., the MaGIC digital data communication protocol, and transmit the properly formatted digital data over the data network 102. The legacy bridge device 120 is further adapted to receive digital audio and control data from the data network 102, convert that data into legacy audio and

control data, and transmit the converted legacy data to the legacy device 130.” See Application 10/617,136, Paragraph 0401. No such network/bridge device interface module of this nature is disclosed in Edson in either the cited lines or elsewhere in the Edson patent. Accordingly, claim 17 of the present Application satisfies the requirements of 35 U.S.C. §102(e), and the Applicant respectfully requests a withdrawal of the rejection of this claim.

*Claim 29*

The examiner has rejected claim 29 under 35 U.S.C. §103(a) over Edson, U.S. Patent No. 6,526,581, in view of Humpleman et al., U.S. Patent No. 6,198,479. Applicant respectfully submits that claim 29 satisfies the requirements of 35 U.S.C. §103(a), as it is not obvious to one of ordinary skill in the art at the time of the invention to invent a consumer electronics device communication and control system that utilizes a wireless consumer electronics device remote control as recited in claim 29 and supported by the Application specifications.

The cited reference, Humpleman, Col. 1, Lines 48-54, merely discloses the following:

Home devices (such as home theatre equipment) are often controlled using a single common control unit, namely a remote control device.

This single common control unit allows a homeowner to control and command several different home devices using a single interface. Thus, many manufacturers have developed control units for controlling and commanding their home devices from a single interface.

The Applicant has not merely included a remote control device in his invention of a universal digital communications and control system for consumer electronic devices. Rather, in claim 29 the Applicant has invented an embodiment of the universal digital communications and control system in which the wireless remote is fundamentally integrated into a complex system. The wireless remote control 118 has the capability to wirelessly connect to the data network 102 and control any consumer electronics devices connected to the data network 102. *See* Application 10/617,136, Paragraph 0400. The specialized use of a wireless remote within a digital communications and control system that allows for universal interconnection, communication, and control of consumer electronic devices in the digital domain is a significant inventive development within the context of the Applicant's invention, and thus fully satisfies the requirements of 35 U.S.C. §103.

*Claim 33*

The examiner has rejected claim 33 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant has amended claim 33 to include the limitations of claim 35, which the examiner rejected under 35 U.S.C. §103(a) over Edson in view of Juskiewicz (Media-Accelerated Global Information Carrier; May 3, 2003, Revision 3.0c). Applicant respectfully submits that claim 33 as amended satisfies the requirements of both 35 U.S.C. §102(e) and 35 U.S.C. §103(a).

Claim 33 as amended recites a gateway network device comprising a digital data communications module connected to the data network access port and the Internet access port, the communications module adapted to transmit digital data received from the Internet to the data network in real time and to transmit digital data received from the data network to the Internet in real time, wherein the digital data communications module is adapted to transmit and receive digital data using a MaGIC digital communications protocol. Edson does not contain this element, and thus claim 33 as amended satisfies the requirements of 35 U.S.C. §102(e).

Claim 33 as amended also satisfies the non-obviousness requirements of 35 U.S.C. §103(a). While the Jusckiewicz specification document may include a MaGIC digital communications protocol, the invention of a consumer electronics device communication and control system which includes a gateway network device comprising an Internet-connectivity-based digital communications module adapted to utilize a MaGIC digital communications protocol as recited in claim 33 is not obvious to one of ordinary skill in the art at the time of the invention.

The MaGIC technology as described in the referenced document discloses its use within the context of music and audio technology. The cited pages of the MaGIC document explain that MaGIC technology was motivated by the drawback that “real-time high-fidelity digital audio has yet to permeate both production and live performance,” that there is “a compelling need in the audio industry for an Open Architecture digital interconnect,” and that “MaGIC provides the ability to create such audio networks appropriate for use in a wide variety of environments ranging from professional audio to home music installations.” While the use of

MaGIC is not limited by those suggested applications, the disclosure does not actually describe the type of expansive use embodied in the Applicant's overall invention of a universal digital communications and control system for consumer electronic devices utilizing a gateway network device with Internet connectivity capabilities.

Accordingly, the Applicant's use of MaGIC technology as recited in claim 33 is not obvious over Edson in view of the Juskiewicz document. Claim 33 comprises a gateway network device comprising an Internet-connectivity-based digital communications module adapted to utilize a MaGIC digital communications protocol. As claim 33 allows for such further creative and new use of the MaGIC technology, specifically as it relates to universal operability in conjunction with Internet connectivity, it constitutes a significant inventive development within the context of the Applicant's invention of a universal digital communications and control system for consumer electronic devices that fully satisfies the requirements of 35 U.S.C. §103.

*Claim 40*

The examiner has rejected claim 40 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant has amended claim 40 to include the limitations of claim 44, which the examiner rejected under 35 U.S.C. §103(a) over Edson in view of Oltman et al., U.S. Patent No. 6,785,226. Applicant respectfully submits that claim 40 as amended satisfies the requirements of both 35 U.S.C. §102(e) and 35 U.S.C. §103(a).

Claim 40 as amended recites in part a device capabilities module connected to the digital data communication interface, the capabilities module adapted to transmit capabilities information associated with the electronics device to the digital data communication interface, and wherein the digital data communication interface is adapted to broadcast the capabilities information to the data network. Edson does not contain this element, and thus claim 40 as amended satisfies the requirements of 35 U.S.C. §102(e).

Claim 40 as amended also satisfies the non-obviousness requirements of 35 U.S.C. §103(a). The examiner rejected the above element in conjunction with the consumer electronics device recited in claim 40 as obvious in light of Oltman et al., Col. 11, Lines 18-20 and 20-24, which recites as follows:

However, router 321 may regularly receive and transmit network status information with neighboring nodes employing inter-nodal communication device 325.

Generally, where no fault condition exists, end router 321 receives data traffic but doesn't continue the link. The contingency communication scheme arising in the case of a link failure is discussed in greater detail in connection with FIG. 1.

The router recited above in Oltman et al. which may regularly receive and transmit network status information is not equivalent to the device capabilities module recited in claim 40 as amended. The device capabilities module as recited in claim 40 and as supported by the Specifications, functions in a manner entirely

different from the router with status information found in the cited reference. The Applicant's device capabilities module, rather, "is adapted to transmit information regarding the [consumer electronic device's] capabilities over the data network 102 using the [network/electronics device interface] module 176. The [device capabilities module] 184 transmits information regarding the [consumer electronic device's] name and the types of audio and control signals output by the [consumer electronic device]. The [device capabilities module] 180 is also operable to receive and store information regarding other devices on the data network 102." *See Application 10/617,136, Paragraph 0426.* Accordingly, claim 40 as amended satisfies the requirements of 35 U.S.C. §103(a).

*Claim 45*

The examiner has rejected claim 45 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant has amended claim 45 to include the limitations of claim 46, which the examiner rejected under 35 U.S.C. §103(a) over Edson in view of Bloomfield et al., U.S. Patent No. 5,555,100. Applicant respectfully submits that claim 45 as amended satisfies the requirements of both 35 U.S.C. §102(e) and 35 U.S.C. §103(a).

Claim 45 as amended recites in part a power input adapted to be connected to a power system and a power output adapted to be connected to a second consumer electronics device. Edson does not contain this power output element, and thus claim 45 as amended satisfies the requirements of 35 U.S.C. §102(e).

Claim 45 as amended also satisfies the non-obviousness requirements of 35 U.S.C. §103(a). The examiner rejected the above power output element in conjunction with the consumer electronics device recited in claim 45 as obvious in light of Bloomfield et al., Col. 4, Lines 15-22, which recites as follows:

Furthermore, the router includes a male AC coupler for coupling the router to an AC power outlet, a female AC coupler for receiving a local facsimile machine power cord, a fused AC surge protector, including a visual integrity indicator, for protecting the router and the local facsimile machine from AC surges, and an isolated power supply, including a visual power-on indicator, for converting the AC power into DC power at various voltages.

The power output disclosed in Bloomfield et al. above is different in configuration and function from the power output recited in claim 45 as amended and as supported by the Specifications. The Bloomfield et al. router power output merely allows for receiving a facsimile device power cord. The Applicant's power output is not merely located within a router within the network to provide power to a device, but is rather located within a consumer electronics device itself to provide power to other consumer electronics devices. "The [power input interface] 186, [power output interface] 188, and [power monitoring/control module] 192 are adapted to ensure that power is supplied to the [consumer electronic device] and that power is passed through the [consumer electronic device] to additional [consumer electronic devices]." See Application 10/617,136, Paragraph 0424; see

*also Application 10/617,136, Fig. 11 (showing daisy-chaining of consumer electronic devices utilizing power output scheme), and Fig. 13 (showing operability of power input and power output interface to supply power from a consumer electronics device to another consumer electronics devices).* Thus, the Applicant's power output as recited in claim 45 is different in configuration and function from the power output recited in Bloomfield et al.

Furthermore, it is not obvious to one of ordinary skill in the art at the time of the invention to include a power output scheme in the consumer electronic devices associated with the Applicant's digital communications and control system invention. The Applicant's use of the power output to allow consumer electronic devices to supply power to additional consumer electronic devices helps to reduce the resource strain on the power network backbone 110, as well as on a limited number of power outlets 112, as shown in Fig. 11 of the present Application.

Accordingly, for the above reasons, claim 45 as amended fully satisfies the requirements of 35 U.S.C. §102(e).

#### Claim 49

The examiner has rejected claim 49 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant respectfully submits that Edson is missing the real time, synchronous, bi-directional, digital data communications module as recited in claim 49.

The examiner rejected this element as met by Edson in Col. 4, Lines 31-43, as shown below:

Within the premises, the gateway may interface to telephone wiring, the in-home power line circuitry; an in-home wireless link, a customer premises local area network, or the like as well as combinations of two or more of these in-home media.

The in-home media and associated device specific interfaces enable connection of virtually any electrical or electronic device within the premises to the network. In this manner, telephones, computers and peripherals, appliances, alarm systems and video and audio entertainment systems all can communicate via a unified in-home network. Also, any or all of these in-home devices may communicate with external systems, via the interfaces to the public networks provided through the gateway.

While Edson recites an in-home wireless link, Edson does not recite each of the required elements of claim 49, particularly that of a real time, synchronous, bi-directional, digital data communications module. Edson speaks nothing of these attributes of the digital data communications module as required in claim 49. Accordingly, claim 49 satisfies the requirements of 35 U.S.C. §102(e).

Furthermore, claim 49 also satisfies the requirements of 35 U.S.C. §103. The digital data communications module's attributes of real time, synchronous, and bi-directional communications are those that are specially tailored to the unique requirements of the Applicant's digital communications and control system invention. As one of the goals of the Applicant's invention is to meet the unique

requirements of real-time high-fidelity digital audio and consumer audio/video components, the attributes of real time, synchronous, and bi-directional communications take on special importance and application. *See Application 10/617,136, Paragraphs 0016-0022.* Accordingly, the included element of a real time, synchronous, bi-directional, digital data communications module as recited in conjunction with the wireless network access device of claim 49 constitutes a significant inventive development within the context of the Applicant's invention that fully satisfies the requirements of 35 U.S.C. §103.

*Claims 50, 54, and 58*

The examiner has rejected claims 50, 54, and 58 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant respectfully submits that Edson is missing the legacy bridge device comprising a legacy device interface as recited in claims 50, 54, and 58.

The examiner rejected the legacy bridge device element as met by Edson in Col. 4, Lines 31-43, as shown below:

Within the premises, the gateway may interface to telephone wiring, the in-home power line circuitry; an in-home wireless link, a customer premises local area network, or the like as well as combinations of two or more of these in-home media.

The in-home media and associated device specific interfaces enable connection of virtually any electrical or electronic device within the premises to the network. In this manner, telephones, computers and

peripherals, appliances, alarm systems and video and audio entertainment systems all can communicate via a unified in-home network. Also, any or all of these in-home devices may communicate with external systems, via the interfaces to the public networks provided through the gateway.

Edson does not recite a legacy bridge device comprising a legacy device interface as recited in claims 50, 54, and 58. Rather, Edson merely describes a gateway providing an interface with in-home devices over networking media. Applicant's claims 50, 54, and 58 each describe more than a mere device interface with a network.

Applicant's claims 50, 54, and 58 recite a legacy bridge device comprising a legacy device interface, which, as supported in the Application specifications, "is adapted to receive legacy audio and control data from a legacy device 130 in any one of a variety of legacy digital data communication formats, . . . to convert that data into a format that can be transmitted over the data network 102, e.g., the MaGIC digital data communication protocol, and transmit the properly formatted digital data over the data network 102. The legacy bridge device 120 is further adapted to receive digital audio and control data from the data network 102, convert that data into legacy audio and control data, and transmit the converted legacy data to the legacy device 130." *See Application 10/617,136, Paragraph 0401.* No such legacy bridge device of this nature is disclosed in Edson in either the cited lines or elsewhere in the Edson patent.

Accordingly, claims 50, 54, and 58 of the present Application satisfy the requirements of 35 U.S.C. §102(e), and the Applicant respectfully requests a withdrawal of the rejection of these claims.

*Claim 66*

The examiner has rejected claim 66 under 35 U.S.C. §103(a) over Edson, U.S. Patent No. 6,526,581, in view of Humpleman et al., U.S. Patent No. 6,198,479. Applicant respectfully submits that claim 66 satisfies the requirements of 35 U.S.C. §103(a), as it is not obvious to one of ordinary skill in the art at the time of the invention to invent a consumer electronics device communication and control system that utilizes a wireless consumer electronics device remote control operatively connected to a wireless access point as recited in claim 66 and supported by the Application specifications.

The cited reference, Humpleman, Col. 1, Lines 48-54, merely discloses the following:

Home devices (such as home theatre equipment) are often controlled using a single common control unit, namely a remote control device. This single common control unit allows a homeowner to control and command several different home devices using a single interface. Thus, many manufacturers have developed control units for controlling and commanding their home devices from a single interface.

The Applicant has not merely included a remote control device in his invention of a universal digital communications and control system for consumer electronic devices. Rather, in claim 66 the Applicant has invented an embodiment of the universal digital communications and control system in which the wireless remote is fundamentally integrated into a complex system. The wireless remote control 118 has the capability to wirelessly connect to the data network 102 and control any consumer electronics devices connected to the data network 102. Furthermore, the wireless remote is operatively connected to the wireless access device, which gives it full integration within the network. *See Application 10/617,136, Paragraph 0400; see also Application 10/617,136, Fig. 11* (showing a wireless device/remote control 118 connected to the wireless network access device 116). The specialized use of a wireless remote integrated within a digital communications and control system that allows for universal interconnection, communication, and control of consumer electronic devices in the digital domain is a significant inventive development within the context of the Applicant's invention, and thus fully satisfies the requirements of 35 U.S.C. §103.

#### *Dependent Claims*

With regard to the above-mentioned dependent claims rejected under 35 U.S.C. §102(b) in the Office Action of June 1, 2007, Applicant also believes that the references are missing elements recited in the claims.

The examiner has rejected claim 13 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant respectfully submits

that Edson is missing the device capabilities module connected to the network/electronic device interface module as recited in claim 13. The examiner rejected this element as met by Edson in Col. 11, Lines 3-8, as shown below:

The CPU 105 implements an operating system and a communication application that control the necessary functions of the router 103 and the firewall 101 to prioritize and route various communications between the internal devices and between the devices and the external communication facilities.

Edson does not recite a device capabilities module connected to the network/electronic device interface module as recited in claim 13, but rather merely recites a communication application within a CPU which controls a router and firewall. Accordingly, claim 13 satisfies the requirements of 35 U.S.C. §102(e).

The examiner also rejected claim 26 under 35 U.S.C. §102(e) as being anticipated by Edson. For the same reasons as above, Applicant respectfully submits that claim 26 satisfies the requirements of 35 U.S.C. §102(e).

The examiner rejected claim 39 under 35 U.S.C. §102(e) as being anticipated by Edson, U.S. Patent No. 6,526,581. Applicant respectfully submits that claim 39 is not anticipated by Edson. Claim 39 comprises network device, further comprising a computer system input port and a computer system, and a digital data communications module adapted to communicate with the computer system. Edson is missing a computer system having the connectivity and operability as recited in claim 39.

The examiner rejected this element as met by Edson in Col. 4, Lines 31-43, which states that the “associated device specific interfaces enable connection. . . within the premises to the network.” Fig. 1 of Edson illustrates this operability, showing the devices, including the computer 43, connected via the device interface 323 to the network.

The claim language and the supporting specification of the Applicant’s invention, however, describe a different configuration than that disclosed by Edson. The computer system configuration described in claim 39 does not describe the configuration of a computer attached to a network data or power backbone as shown in Edson, but rather describes a computer system that may communicate with the gateway device of the base claim 33. *See Application 10/617,136, Fig. 11, Computer Systems 128 which communicate to Gateway Device 114; see also Application 10/617,136, Paragraph 0399.*

Not only does the above configuration described in claim 39 constitute patentable material under 35 U.S.C. §102, it also satisfies the non-obviousness requirement of 35 U.S.C. §103. The configuration of claim 39, in allowing for communication between computer systems and the gateway device, allows for the use of computer systems within the system without substantially compromising the resources of the network data or power backbone, especially as it relates to computer system communication through the gateway to the telephone system or the Internet. Allowing for computer system communication to the gateway 114 itself, and thus to the telephone system 124, and to the Internet 122, without sacrificing network data backbone 104 or power backbone 110 resources, is a

significant inventive development within the context of the Applicant's invention of a universal digital communications and control system for consumer electronic devices that fully satisfies the requirements of 35 U.S.C. §103.

This discussion is not exhaustive of the facets of the invention, and Applicant hereby reserves the right to present additional distinctions as appropriate.

Applicant further reserves argument regarding each of the claims rejected under either 35 U.S.C. §102 or 35 U.S.C. §103 in the Office Action of June 1, 2007, as the Applicant believes the claims are not anticipated by the references cited by the examiner and also are not obvious to one of ordinary skill in the art at the time of the invention. Applicant respectfully requests allowance of the claims.

### Summary

Applicant has commented on some of the distinctions between the cited references and the claims to facilitate a better understanding of the present invention. This discussion is not exhaustive of the facets of the invention, and Applicant hereby reserves the right to present additional distinctions as appropriate. Furthermore, while these remarks may employ shortened, more specific, or variant descriptions of some of the claim language, Applicant respectfully notes that these remarks are not to be used to create implied limitations in the claims and only the actual wording of the claims should be considered against these references.

Accordingly, it is respectfully submitted that all pending claims 1-5, 7-15, 17-34, 45 and 47-66 are in condition for allowance.

Respectfully submitted,

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